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Northern Public Radio

ORIGINAL

WNIR

WNIT

WNIW

WNIQ

WNIE

NIRIS

Before the

FEDERAL COMMUNICATION COMMISSION

WASHINGTON, D.C. 20554

)

In the Matter of)

)

Creation of a Low) MM Docket No. 99-25

Power Radio Service)

) RM 9208

) RM 9242

Comments of

Northern Illinois Radio Information Service

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Northern Illinois Radio Information Service (NIRIS) is a radio reading service of Northern Public Radio, the broadcasting service of Northern Illinois University. Users of NIRIS are blind, visually impaired, and other print-disabled individuals. More than 150 volunteers, supported by a professional staff, read newspapers, magazines, and other timely and special interest materials to our users. Our service area includes 15 counties of northern Illinois and 3 counties of southern Wisconsin. We operate on a

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THE BROADCASTING SERVICE OF NORTHERN ILLINOIS UNIVERSITY

subcarrier of WNIJ FM and its repeater stations WNIW/WNIQ/WNIE. Northern Illinois Radio Information Service has been in existence for 20 years. It is one of approximately 150 such services nationwide serving an estimated 1,000,000 listeners.

Like NIRIS, most radio reading services operate on the subcarrier of an NCE Station. By nature, these signals are fragile and subject to interference. Because of this, we have a certain level of concern about the establishment of a new class of low power FM stations. Our apprehension falls into two categories: technical and policy.

From the technical standpoint, for an LPFM class of stations to be created, the Commission would have to reduce existing interference protection standards. This leads us to draw the conclusion that at least some of our listeners will receive a signal of poorer quality, or perhaps be totally disenfranchised.

In addition, we are concerned about how a new class of stations might effect the analog-to-digital transition being studied by the Commission. The In-Band, On-Channel (IBOC) proposals under consideration will likely use existing sidebands to accomodate digital transmission. Because these proposals are based on current interference standards, any change in those standards could have a serious effect on Northern Illinois Radio Information Service and other reading services. It is conceivable that the very viability of our service could be brought into question.

In terms of policy, the Commission has noted that the creation of an LPFM class of

stations would offer the potential for increased minority and/or female ownership of such stations. NIRIS understands the desirability of such a goal, but to accomplish it at the expense of a currently served disabled constituency would seem to be dubious policy. The Commission has long recognized that the provision of radio reading service for the blind, visually disabled, and print impaired is important to the national interest. In 1983, in the course of determining that public radio stations could use their subcarriers for remunerative purposes, the Commission stated unequivocally that stations taking advantage of the new flexibility must "ensure that neither existing nor potential radio reading services for the blind are diminished...by the pursuit of commercial subcarrier undertakings." (Amendment of Section 73.593 of the Commission rules, 54 RR 2d 25, 36). By relaxing technical standards to accommodate low power FM, the Commission could be creating a "robbing Peter to pay Paul" situation.

In considering the LPFM proposal, Northern Illinois Radio Information Service has many questions. For example, to what extent will our current coverage and service be reduced? How does the LPFM proposal mesh with the analog-to-digital conversion, and how will that affect radio reading services? On the policy side, to what degree should the currently disabled audience service should be jeopardize so that minority/female ownership goals might be achieved?

Northern Illinois Radio Information Service requests that the Commission defer any action on the LPFM proposal until such time as the technical and policy questions can

be addressed in a factual and comprehensive manner.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann L. McHale". The signature is fluid and cursive, with the first name "Ann" and last name "McHale" clearly distinguishable.

Ann L. McHale

Director

Northern Illinois Radio Information Service